

LEONARDO M. ALDRIDGE
Attorney-At-Law
20 Vesey St. Suite 400
New York, NY 10007

July 3, 2024

BY ELECTRONIC FILING

Hon. Paul G. Gardaphe
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardaphe
Paul G. Gardaphe, U.S.D.J.
Dated: July 8, 2024

Letter Motion Requesting Appointment under the CJA of Paralegal for U.S. v. Qingzhou Wang,
Cr. No. 23-302

Your Honor:

I was recently appointed to represent Mr. Qingzhou Wang. Trial is currently slated to begin on January 13, 2025. The discovery in this case is very voluminous.

As the Court knows, the government indicted Mr. Wang with (1) Fentanyl Trafficking Conspiracy; (2) Conspiracy to Import Fentanyl Precursor Chemical with Intent to Manufacture Fentanyl; (3) Importation of Fentanyl Precursor Chemical with Intent to Manufacture Fentanyl; (4) Importation of Methamphetamine Precursor Chemical; (5) Conspiracy to Commit Money Laundering.

In anticipation of trial, the purpose of this motion-letter is to request that this Honorable Court appoint Mr. Wang a paralegal under provisions of the Criminal Justice Act (CJA). Chapter 3 Section 320.70.50 of the CJA Guidelines provides that “for services of paralegals... the court will determine a reasonable hourly compensation rate that may not exceed the lesser of the rate paid to counsel under the CJA or the rate typically charged by counsel to a fee-paying client for such services.”

Ms. Ana Melendez-Fenollal is a recent law school graduate and attorney who worked with me as a paralegal prior to taking her bar exam. She collaborates with my office daily and her help

was essential in a successful federal criminal trial last November. Ms. Melendez-Fenollal's email address is afenollal@sbgblaw.com

For the reasons stated above, I respectfully request that this Honorable Court, under the provisions of the CJA and to ensure Mr. Wang's Sixth Amendment rights to effective assistance of counsel, appoint Ms. Meléndez-Fenollal as paralegal at a rate of \$75 per hour up to a maximum of 100 hours to assist in discovery review and legal research during the pendency of this case.

Respectfully,

S/Leonardo M. Aldridge
Leonardo M. Aldridge

Cc. AUSAs Alexander Nuo Li and Kevin T. Sullivan